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Attorneys for Defendant
TRANSUNION LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NOEMIA CARVALHO, on behalf of herself
and other similarly situated people,

Plaintiff,

vs.

CREDIT CONSULTING SERVICES, INC.,
dba CCS, EQUIFAX CREDIT
INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS,
INC., TRANS UNION LLC, and DOES 1-50,
inclusive,

Defendants.

Case No. 5:08-cv-01317-JF-HRL

**REQUEST OF DEFENDANT
TRANSUNION LLC TO APPEAR
TELEPHONICALLY AT HEARING ON
PLAINTIFF'S MOTION TO REMAND
CASE TO STATE COURT;
DECLARATION OF BRIAN C.
FRONTINO IN SUPPORT THEREOF**

Date: June 20, 2008

Time: 9:00 a.m.

Location: Courtroom 3

[[Proposed] Order Lodged Concurrently]

1 Defendant TransUnion LLC ("TransUnion") respectfully requests to appear telephonically
2 at the hearing on Plaintiff's Motion to Remand Case to State Court currently set for hearing on
3 June 20, 2008, at 9:00 a.m. before the Honorable Jeremy Fogel.

4 Good cause exists to grant this request because counsel for TransUnion would be required
5 to travel from Los Angeles, California to San Jose, California, such that TransUnion will incur
6 significant travel costs and attorney's fees at a time when TransUnion is attempting to minimize the
7 cost of litigation in this and numerous other matters. Counsel for TransUnion believes the
8 objectives of this hearing will be accomplished if TransUnion appears by telephone.

9 Dated: June 5, 2008

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
STEPHEN J. NEWMAN
BRIAN C. FRONTINO

12 By: /s/ Brian C. Frontino
13 Brian C. Frontino

14 Attorneys for Defendant
15 TRANSUNION LLC

STROOCK & STROOCK & LAVAN LLP
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Los Angeles, California 90067-3086

DECLARATION OF BRIAN C. FRONTINO

I, Brian C. Frontino, hereby declare:

1. I am admitted to practice before this Court and am an associate with Stroock & Stroock & Lavan LLP, counsel for defendant TransUnion LLC ("TransUnion") in the above-captioned matter. I have personal knowledge of the facts stated herein and if called as a witness, I could and would competently testify thereto.

2. My office is located in Los Angeles, California. An in-person appearance at the hearing on Plaintiff's Motion to Remand Case to State Court scheduled for June 20, 2008, would require me to travel by plane to San Jose, California and potentially seek accommodations the evening before. This will cause TransUnion to incur significant attorneys' fees and costs for travel time and expenses at a time when TransUnion has requested that I minimize the cost of litigation in this and other matters through, among other things, requesting telephonic court appearances whenever possible.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 5th day of June 2008.

/s/ Brian C. Frontino

Brian C. Frontino

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Attorneys for Defendant
TRANSUNION LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NOEMIA CARVALHO, on behalf of herself
and other similarly situated people,

Plaintiff,

vs.

CREDIT CONSULTING SERVICES, INC.,
dba CCS, EQUIFAX CREDIT
INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS,
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Defendants.

Case No. 5:08-cv-01317-JF-HRL

**[PROPOSED] ORDER GRANTING
REQUEST OF DEFENDANT
TRANSUNION LLC TO APPEAR
TELEPHONICALLY AT HEARING ON
PLAINTIFF'S MOTION TO REMAND
CASE TO STATE COURT**

Date: June 20, 2008
Time: 9:00 a.m.
Location: Courtroom 3

1 The Request of Defendant TransUnion LLC (“TransUnion”) to Appear Telephonically at
2 the Hearing on Plaintiff’s Motion to Remand Case to State Court came before the Honorable
3 Jeremy Fogel of the above-captioned Court on or about June 5, 2008. After considering the
4 Request and good cause appearing, **IT IS HEREBY ORDERED** that TransUnion shall be
5 permitted to appear via telephone at the hearing on the Motion of Plaintiff Noemia Carvalho to
6 Remand Case to State Court currently scheduled for June 20, 2008 at 9:00 a.m.

7
8 DATED: _____, 2008

The Honorable Jeremy Fogel
United States District Court Judge

9
10 Respectfully submitted,

11 STROOCK & STROOCK & LAVAN LLP
12 JULIA B. STRICKLAND
13 STEPHEN J. NEWMAN
14 BRIAN C. FRONTINO

15 By: /s/ Brian C. Frontino
16 Brian C. Frontino

17 Attorneys for Defendant
18 TRANSUNION LLC
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